

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC) (JRC)

**REPLY DECLARATION IN FURTHER
SUPPORT OF PLAINTIFF’S MOTION
FOR SANCTIONS**

Jamie S. Felsen, Esq. declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
that the following is true and correct:

1. I am admitted to practice before this Court and am a member of Milman Labuda Law Group PLLC, who – together with Sage Legal LLC – are the attorneys for the Plaintiff IME WatchDog, Inc. in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the file maintained by this office.

3. This reply declaration is submitted in further support of Plaintiff’s motion for sanctions against Defendants Safa Gelardi, Vito Gelardi, and IME Companions LLC (“Defendants”).

4. Annexed hereto as **Exhibit “A”** is a copy of public records from the NYC Department of Finance Office of the City Register establishing that, on March 21, 2024, Anthony Masullo sold real property at 6506 10th Avenue, Brooklyn, NY for \$1,770,000.00 at which time he satisfied a \$676,500.00 mortgage that was previously recorded on July 5, 2013.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
October 29, 2024.

/s/ Jamie S. Felsen
Jamie S. Felsen, Esq.